

April 4, 2014

Dear Dr. Altman and distinguished members of the Health Policy Commission,

Thank you for the opportunity to comment on the Patient Centered Medical Home certification (PCMH) standards. We are Clinicians*UNITED*, a multidisciplinary group of behavioral health clinicians who are associate members of SEIU Local 509. Our top priorities are ensuring that every Bay State resident has access to quality, affordable mental health services -- and establishing fair reimbursement policies and practices for clinicians.

As independent mental health providers, we applaud the Health Policy Commission (HPC) for raising the critical issue of integrating quality mental health care with physical health. We are particularly interested in the “Integrated clinical care management (focus on behavioral health)” standard. Every day across Massachusetts, we provide outpatient behavioral health care to address issues such as depression, addiction, post-traumatic stress disorder, and eating disorders. All of these conditions affect physical health, if appropriate mental health treatment is not given. Private practitioners provide these services for thousands of clients. We are an essential resource to help folks live in the community, rather than in hospitals or prison beds. Our experience and knowledge is vital to this expanded mental health care structure.

Currently we face barriers to delivering necessary care. Counterproductive insurance policies, low reimbursement rates, time-consuming paperwork, discouragement of group therapy, and authorization requirements limit access to treatment. These challenges pose tremendous threats to the stability and effectiveness of behavioral health services by fragmenting the health care system and failing to recognize the importance of the care we provide.

We are concerned that if behavioral health care is only provided by clinicians hired by PCMH, there will be long waiting lists and patients will not receive adequate care. Therefore, we urge you to mandate that PCMH include clinicians who are practicing in the community on the coordinated care teams. Networks of private clinicians associated with, but not hired by, PCMH can treat complicated patients while also keeping costs down and improving treatment outcomes. We would also appreciate if the HPC developed a way to educate private practitioners about how to form associations with PCMH.

The integration of mental and physical health is crucial to ensuring that a holistic and cost effective health care system is available to all residents of Massachusetts. We look forward to being an essential part of this process and discussing expanding the role of the thousands of independent mental health care providers in the Commonwealth.

Thank you,

Melody Hugo

Clinicians*UNITED* Director